## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE COLUMBIA DIVISION

NANCY CROWDER, as attorney-in- fact for Billy Vestal,	)
Plaintiff,	)
V.	No. 1:13-CV-3 ) JURY DEMAND
MARSHALL COUNTY, TENNESSEE and DONNELL KELLY,	) ) )
Defendants.	)

## UNOPPOSED MOTION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE

Comes Defendant Donnell Kelly, and moves the Court for entry of an Order continuing the Initial Case Management Conference in this matter, which is currently scheduled for Friday, April 5, 2013 at 2:00 p.m. in Columbia. As grounds for this Motion, Defendant Kelly was just served with the Plaintiff's Amended Complaint on March 22, 2013. His Answer to the Complaint is due on April 12, 2013, which is one week after the Initial Case Management Conference. The undersigned counsel recently has been retained to defend Mr. Kelly and will need additional time to confer with his client in preparation for filing a responsive pleading.

Before filing this Motion, the undersigned counsel discussed this proposed continuance with counsel for the Plaintiff and Defendant Marshall County. There is no opposition to this Motion.

WHEREFORE, Defendant Donnell Kelly respectfully requests that the Court enter an Order continuing the April 5, 2013 Initial Case Management Conference until the Court's next available court date in Columbia.

Respectfully submitted,

/s/ Jeffrey M. Beemer Jeffrey M. Beemer, #17247 Dickinson Wright PLLC Fifth Third Center, Suite 1401 424 Church Street Nashville, TN 37219 (615) 244-6538 (615) 256-8386 (fax)

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served by electronic filing or United States Mail, first class, postage pre-paid, to:

Jerry Gonzales Jerry Gonzalez, PLC 2441-Q Old Fort Parkway Box 381 Murfreesboro, TN 37128

Mark Nolan Kathryn W. Olita Batson Nolan PLC 121 S. Third Street Clarksville, TN 37040

This 2nd day of April, 2013.

/s/ Jeffrey M. Beemer Jeffrey M. Beemer

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